| Winston & Strawn LLP 101 California Street San Francisco, CA 94111-5802 | 1 2 3 4 5 6 7 8 9 10 11 12 13 14 | David S. Bloch (SBN: 184530) dbloch@winston.com WINSTON & STRAWN LLP 101 California Street San Francisco, CA 94111-5802 Telephone: (415) 591-1000 Facsimile: (415) 591-1400 Attorneys for Plaintiffs QUINN EMANUEL URQUHART & SULLIVAN, LLP Claude M. Stern (Bar No. 96737) claudestern@quinnemanuel.com Evette Pennypacker (Bar No. 203515) evettepennypacker (Bar No. 203515) evettepennypacker@quinnemanuel.com Thomas R. Watson (Bar No. 227264) 555 Twin Dolphin Dr., 5th Floor Redwood Shores, Ca 94065 Telephone: (650) 801-5100 Attorneys for Defendant UNITED STATES DISTRICT COURT | | | | |
|---|--|---|--|--|--|--|
| | 15 | NORTHERN DISTRICT OF CALIFORNIA | | | | |
| | 16 | SAN FRANCISCO DIVISION | | | | |
| | 17 18 19 20 21 22 23 24 25 26 27 28 | TECHCRUNCH, INC., et al.) Case No. 3:09-cv-05812 RS (PSG) Plaintiffs,) JOINT STIPULATION AND [PROPOSED] vs.) FUSION GARAGE PTE. LTD.,) Defendant.) | | | | |
| | | JOINT STIPULATION AND [PROPOSED] REVISED SCHEDULING ORDER Dockets.Justia.com | | | | |

WHEREAS, the parties engaged in private mediation on September 21, 2011, before JAMS mediator John Bates in San Francisco, California;

WHEREAS, the parties in this action executed a Memorandum of Understanding regarding final settlement of this case at the September 21, 2011 mediation;

WHEREAS, the parties sought a stay pending the execution of a definitive agreement, which was granted by the Court on September 23, 2011 (Dkt. 216);

WHEREAS, the parties were unable to reach a final agreement regarding settlement despite lengthy and good faith settlement negotiations (Dkt. 217, 219, 220);

WHEREAS, the parties have meet and conferred regarding all dates, deadlines, motions, and other activities;

WHEREAS, the parties believe a one month continuance of the trial date is necessary to complete the remaining discovery in this case;

NOW THEREFORE, it is hereby stipulated by the undersigned counsel on behalf of the parties identified below pursuant to Local Rules 40-1 and 7-12 that, subject to Court approval, the following dates shall apply:

| Event | Original Date | Proposed New Date |
|--|----------------------|--|
| Plaintiffs' Opposition To Defendant's Motion To Compel | September 23, 2011 | December 2, 2011 |
| Defendant's Reply In Support Of The Motion To Compel | September 30, 2011 | December 9, 2011 |
| Further CMC | December 8, 2011 | No change |
| Hearing On Defendant's Motion To Compel | October 18, 2011 | December 15, 2011 at 10:00 a.m. before Magistrate Judge Grewal [schedule permitting] |
| Plaintiffs' Responses To Defendant's Requests for Production (Set 4), Interrogatories (Set 3), and Requests for Admission (Set 1) Defendant's Responses To Plaintiffs' Requests For | Various | December 16, 2011 |

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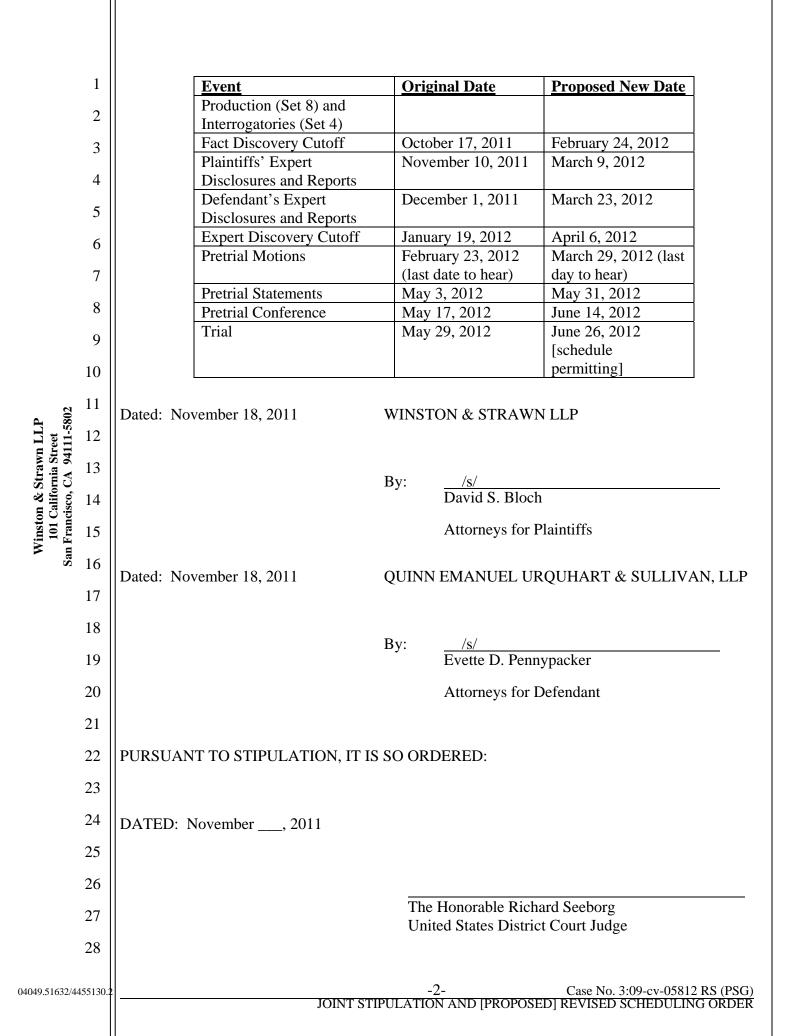
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| | 1 | ATTESTATION | | | | |
|---|----------|--|--|--|--|--|
| | 2 | I, Evette D. Pennypacker, hereby attest, pursuant to N.D. Cal. General Order No. 45, that I | | | | |
| | 3 | have obtained the concurrence to the filing of this document of each signatory hereto. | | | | |
| | 4 | By: /s/ Evette D. Pennypacker | | | | |
| | 5 | Evette D. Pennypacker | | | | |
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